EXHIBIT 61

MAO DECLARATION ISO PLAINTIFFS' MOTION FOR CLASS CERTIFICATION

PUBLIC REDACTED VERSION

Message

From: ohelyse [ohelyse

Sent: 10/21/2020 8:36:37 AM

To: ohelyse ohelyse h; adebooi h; robertbrauer h; kallebu

Subject: AAAAM3Erg4s-Eid2AK4m6ps

Attachments: image.png; image.png; image.png; image.png; Screenshot 2020-10-21 at 11.21.43.png; giphy.gif; image.png;

Screenshot 2020-10-21 at 14.54.52.png; Screenshot 2020-10-21 at 14.54.07.png; IMG_2079.png; Screenshot 2020-

10-22 at 08.28.24.png

• ohelyse 2020-10-21T08:36:37.822Z

Robert Brauer & ■Arne de Booij if I may pick your 🗆 s

• ohelyse 2020-10-21T08:36:41.321Z

o image.png

• ohelyse 2020-10-21T08:37:02.776Z

re: the highlighted passage, our leads have asked, "Do we have insight on how users would react to this?"

• ohelyse 2020-10-21T08:38:06.308Z

we can tweak the wording of the passage itself if it's not perfect, but could either of you point to your favorite citation for the assertion that fine-grained contextual permissions are more resonant / more effectively communicate privacy trade-offs to users?

• ohelyse 2020-10-21T08:42:36.662Z

there were some other high-level questions about "what is the right level of granularity", and I think generally we need to move toward a crisp articulation (also in the visioning stage) of what we think is the right overall permissioning schema for Google

• ohelyse 2020-10-21T08:43:17.555Z

from my perspective we don't (as a company) have a very even approach to determining what we need to ask permission for, and what we don't — also, how much contextual information is appropriate/necessary to get consent

• adebooij 2020-10-21T08:43:19.744Z

well, there are several aspects here - 'how they react' could be how they would behave, are they likely to accept, decline or dismiss? This of course depends on the context and the consent itself but looking at data for Location history, which is not part of account creation, overall opted-in ratio of 28DA users is around y. I remember monsees mentioning that opt-in % for in-context WAA consent was around

• adebooij 2020-10-21T08:43:57.721Z

these are two different numbers - LH is 28DA users that are opted in, WAA is amount that opts-in during a consent

• **ohelyse** 2020-10-21T08:44:05.935Z right

• adebooij 2020-10-21T08:44:29.438Z

there is also sentiment and comprehension

• ohelyse 2020-10-21T08:44:51.029Z

my read re: "how they react" was "do people find this easier to understand / are able to make better-informed choices / feel more in-control, respected, happy, etc." — so, the latter © but you make a good point!

adebooij 2020-10-21T08:45:27.653Z

I don't believe that it is easier to comprehend an in-context consent vs account creation consent . that is mainly the fault of the scope and complexity of the system vs where we ask it

adebooij@
 2020-10-21T08:46:47.618Z

but for different reasons - one issue I have seen with g

• adebooij@_____2020-10-21T08:53:35.117Z

I still have this WIP slide that we can build out a bit more

• adebooij n 2020-10-21T08:53:37.191Z

https://docs.google.com/presentation/d/1F982g04PuRkYsFPT98tGTbJujW-

DV0awU4AJWwdfPpA/edit#slide=id.g8d5dc2dbba_0_0

https://drive.google.com/open?id=1F982g04PuRkYsFPT98tGTbJujW-DV0awU4AJWwdfPpA

https://docs.google.com/presentation/d/1F982g04PuRkYsFPT98tGTbJujW-

DV0awU4AJWwdfPpA/edit#slide=id.g8d5dc2dbba 0 0

• adebooij@ 2020-10-21T08:54:02.594Z

I will look at what the ads team has collected as well

• ohelyse@ 2020-10-21T08:54:51.582Z

re: _I don't believe that it is easier to comprehend an in-context consent vs account creation consent. that is mainly the fault of the scope and complexity of the system vs where we ask it_ I think there's a difference between asking people to turn on cross-Google preferences "in context" vs. asking them to turn on a product-specific personalization feature "in context"

• ohelyse@ 2020-10-21T08:55:31.013Z

if we're suggesting that we move away from the idea of broad "cross-Google" permissions in general, do you agree that that approach should be more resonant for users?

• ohelyse@ 2020-10-21T08:55:55.656Z

these beauties, for example

- image.png
- ohelyse@ 2020-10-21T08:56:18.661Z

hahaha

• ohelyse@

if the second screen were 4 separate permissions that appeared in Assistant, Maps, Trips and GPay respectively (IF you had the relevant p13n controls ON in Gmail / Chat / Meet vs. this setup

• ohelyse@ 2020-10-21T09:02:05.679Z

anyway, I'm trying to get my head around what a holistic approach to permissioning across Google could look like. Android has an established approach (both re: what requires permission and how to ask for it) but we seem to be treating these things wildly differently across services

- ohelyse@ 2020-10-21T09:02:09.921Z
- image.png
- ohelyse@ 2020-10-21T09:02:46.304Z

why do I need to give permission for my emails to be filtered / categorized in a p13n context? what's our threshold?

• ohelyse@ 2020-10-21T09:03:39.583Z

then my favorite...

image.png

• ohelyse@ 2020-10-21T09:04:34.263Z

anyway, I know this is a can of worms & thanks for the slide, Arne de Booij! just want us to keep in mind how challenging the questions we're getting re: "what is the right level of granularity" really are, and how we might need to ultimately describe our vision as an improvement over the status quo

adebooij@
 2020-10-21T09:14:34.478Z

yes, it is challenging on many levels - what do we mean when we say 'in context'? there are many contexts to consider like 'at sign-in', 'at first launch', 'at xth launch', 'after action X is taken'

• ohelyse@_____2020-10-21T09:15:01.432Z

yesss

• adebooij@ 2020-10-21T09:15:10.226Z

all of these can affect sentiment - just saw this deck for uxr on education primitives

• adebooij@ 2020-10-21T09:15:22.109Z

https://docs.google.com/presentation/d/10igD-roeBBboXqLx6aRwgZhN40mK9sJDlsAo7QwTrsY/edit?ts=5f68b4e7#slide=id.g9805d6eaa9 2 110

https://docs.google.com/presentation/d/10igD-roeBBboXqLx6aRwgZhN40mK9sJDlsAo7QwTrsY/edit?ts=5f68b4e7#slide=id.g9805d6eaa9 2 110

https://drive.google.com/open?id=10igD-roeBBboXqLx6aRwgZhN40mK9sJDlsAo7QwTrsY

• ohelyse@ 2020-10-21T09:15:26.931Z

we need to clarify our definition of "in-context" and maybe come up with some additional language so we can be more precise

• adebooij@ 2020-10-21T09:16:07.582Z

relevance of the consent to the context of the task can affect sentiment

• ohelyse@ 2020-10-21T09:16:13.504Z

yes

• ohelyse@ 2020-10-21T09;16:22.651Z

"relevance to the task"

• adebooij@ 2020-10-21T09:16:39.563Z

meaning, most of the time, people have a specific goal in mind

• adebooij@_____2020-10-21T09:17:22.499Z

so in this research, it seems that if the message was relevant to what they were doing, at was perceived as more positive than when it didn't relate to that

• ohelyse@_____2020-10-21T09:17:22.842Z

yes - sorry, I was flagging that as particularly resonant and maybe more useful than "in-context"

• adebooij@_____2020-10-21T09:18:01.087Z

but how do you know if it is relevant to a particular person?

• robertbrauer 2020-10-21T09:18:44.114Z

based on the context;-)

• ohelyse@ 2020-10-21T09:18:50.948Z

I think _task_ is better than _person_ for that reason — like, if someone clicks the search box in photos and one of the populated suggestions is "Allow Photos to recognize faces so you can search for people?"

• robertbrauer (2020-10-21T09:19:15.278Z

is task any different from person?

• ohelyse@ 2020-10-21T09:19:26.427Z

what I'm wondering as well

- adebooij@ 2020-10-21T09:19:29.031Z
- https://lh5.googleusercontent.com/jH8C4Dd3X21TkZRtL0P9hg0U31VQpyHd7kuyNeqmvWqbw-

jyaRlv4UiFQ4rXfDutgM2KwnccStEtFyWrVHhbrw0rKVOvbyIMlrol7pvxKLYOlSy6xCNLLtvGbTQUy7W3WYGAGSHKbIo4

• robertbrauer 2020-10-21T09:19:30.483Z

someone does something

• robertbrauer (2020-10-21T09:20:40.481Z

the in-context stuff mostly depends on one's interpretation of context

• robertbrauer(data 2020-10-21T09:21:19.410Z

maybe put a different way: let's not annoy the people who don't get any benefit out of the task interruption

• adebooij@ 2020-10-21T09:21:57.165Z

it depends on how you communicate to that user - maybe we don't interrupt but show a potential path (like what elyse said)

• adebooij@ 2020-10-21T09:22:03.948Z

like reassure

adebooij@
 2020-10-21T09:22:11.560Z

it's there where it might be needed

• ohelyse@ 2020-10-21T09:22:49.409Z

the problem with what I said above is it would need to be dismissible for people who say "nope, never, Google can't be trusted"

• ohelyse@ 2020-10-21T09:22:57.626Z

but generally I think there's a path there

• robertbrauer@ 2020-10-21T09:23:17.119Z

yep

• adebooij@ 2020-10-21T09:23:34.812Z

or, just accept for those that are fine

• adebooij@ 2020-10-21T09:23:57.204Z

"all good, don't bother me again, wish we still had WAA" type people

• ohelyse@ 2020-10-21T09:23:59.643Z

since the precise nature of those integrations will be super dependent on the product experiences themselves, I'm hoping we can get to a place where we can take something of a platform-approach to defining our modes of permissions

• ohelyse@ 2020-10-21T09:24:47.313Z

so people don't get 14 paragraphs of text in Gmail asking if they're OK with auto-suggestions and email categorization, and 10 words in Photos asking if Google can store their facial data (arguable more sensitive)

• Updated on2020-10-21T09:25:21.025Z

so people don't get 14 paragraphs of text in Gmail asking if they're OK with auto-suggestions and email categorization, and 10 words in Photos asking if Google can store their facial data (arguably more sensitive)

• robertbrauer(a 2020-10-21T09:25:19.043Z

"arguable more sensitive", depends on the person

• robertbrauer@ 2020-10-21T09:25:31.687Z

but I agree that we can be opinionated about that

• ohelyse@ 2020-10-21T09:25:40.878Z

right — so IMO we should apply some evenness

• robertbrauer (2020-10-21T09:26:38.642Z

aight, then let's throw some spaghetti at the wall, what's your suggestion? ©

• robertbrauer 2020-10-21T09:26:54.141Z

for the eveness

• robertbrauer(4 2020-10-21T09:28:09.650Z

and random side note... one thing that keeps annoying me and motivated many of the "in-context" discussions (which are ultimately just about relevance... or selling features to people who might eventually use them)

Screenshot 2020-10-21 at 11.21.43.png

• adebooij@ 2020-10-21T09:29:05.544Z

is that abandoned accounts?

robertbrauer(2020-10-21T09:29:10.563Z

yeah

• robertbrauer@ 2020-10-21T09:29:26.830Z

we make people jump through all the hoops at account creation and then many of them just be like...

o giphy.gif

• adebooij@ 2020-10-21T09:29:55.851Z

that gif

• robertbrauer(a 2020-10-21T09:30:02.806Z

apologies for the graph from 3 years ago, but I reckon little has changed

• adebooij@ 2020-10-21T09:30:28.611Z

I don't suppose we as google benefit from those accounts much?

• ohelyse@ 2020-10-21T09:31:48.353Z

so, as I tried to get at above, having a clear threshold re: what we need to ask for permission about and what we don't across Google (if that exists I'm not familiar with it) so we're able to assess the breadth of our privacy / p13n permissions as a whole and begin to understand what normalization might look like — also to prevent just overloading people with so many asks that they are blinded by science (why is the email categorization bullet the FIRST BULLET?!) treating Google as a platform. The Android permissions research had an effect on me ©

ohelyse@ 2020-10-21T09:33:21.116Z

If we're able to truly make things granular (so, no more "you use one app that we see as sitting in a suite of these 3 apps! opt-in to allowing data from these 3 apps to personalize the experience of these other 4 apps which you may or may not use?) but rather the "build your own ecosystem" approach

• **ohelyse**@ 2020-10-21T09:34:08.871Z

what will we lose? (re: "I used to just be able to skip this big screen full of text because I didn't care. or I wish Chat / Meet / Calendar just worked seamlessly together and would stop asking me things) vs. what will we gain?

• robertbrauer (a 2020-10-21T10:05:38.700Z

Chat / Meet / Calendar aka, the expectation that services collaborate comes up regularly, but Id

• robertbrauer 2020-10-21T10:05:48.997Z

diffferentitate between Gsuite and Consumers

• robertbrauer@ 2020-10-21T10:06:07.838Z

Google Workplace vs. Consumer Accounts

• robertbrauer@ 2020-10-21T10:07:35.923Z

with workplace out of the equation, we know that most awkwardness happens between the seems. 1P vs. 3P (because, what's the difference) and inbetween products

• robertbrauer (2020-10-21T10:08:41.342Z

i remember from chats with Ben on Android permissions that he was very fond of developers not asking for stuff they don't need

• robertbrauer@ 2020-10-21T10:09:04.536Z

they achieved privacy by burdon

Updated on2020-10-21T10:09:22.561Z

they achieved privacy by burden

ohelyse@ 2020-10-21T10:09:33.692Z

burden should be spelled burdon, I stand by that

• **ohelyse**@ 2020-10-21T10:09:34.678Z

but go on

• robertbrauer@ 2020-10-21T10:09:45.533Z

lol

• robertbrauer@ 2020-10-21T10:10:12.204Z

think: your local weather app not asking for access to contacts anymore

• ohelyse@ 2020-10-21T10:10:30.687Z

I thought this was interesting in that regard:

https://docs.google.com/presentation/d/1cSWuBdujW72Z7BRrY3tliNhUYHG2EVOg8XvNvR6uXNk/edit?pli =1#slide=id.g5db7487695 6 0

https://drive.google.com/open?id=1cSWuBdujW72Z7BRrY3tliNhUYHG2EVOg8XvNvR6uXNk

 https://docs.google.com/presentation/d/1cSWuBdujW72Z7BRrY3tliNhUYHG2EVOg8XvNvR6 uXNk/edit?pli=1#slide=id.g5db7487695 6 0

• ohelyse@ 2020-10-21T10:10:53.146Z

(maybe you originally sent that to me?)

the benefit of "Oauth" would be that our claims about the utility of a Google Account would still hold

2020-10-21T10:21:10.803Z ohelyse@

I think the Oauth idea is interesting, but the opposite swing-of-the-pendulum from the iCloud idea — where we embrace that Google-owned experiences are special, made with love, and we stand by them at another level; also that they have the potential for amazing, seamless integrations beyond what most 3ps make available (maybe). We got a good amount of feedback from Micah re: "what about our unique p13n offerings?" and I think there is some halo-affect we're aiming for that's like "you already use YouTube and Gmail and Search, why not try Photos? it's Google! You'll love it!"

thanks

• robertbrauer(4 2020-10-21T10:30:02.472Z

best project name ever

• ohelyse@ 2020-10-21T10:30:12.121Z

• robertbrauer@ 2020-10-21T10:30:42.249Z

I was part of that research

• robertbrauer@ 2020-10-21T10:31:06.400Z

remember, I was the Oauth guy at some point in Identity

• robertbrauer@ 2020-10-21T10:31:24.662Z

• ohelyse@ 2020-10-21T10:31:34.661Z

?

• robertbrauer@ 2020-10-21T10:31:40.970Z

errmmm... let me find the decks

• robertbrauer@ 2020-10-21T10:32:23.045Z

Looks like a Somewhat colorful buttons

that all look the same at the end

ohelyse@ 2020-10-21T10:32:40.958Z

I see

• robertbrauer@ 2020-10-21T10:55:36.392Z

Can't find the stuff right now. Sorry. On mobile.

• robertbrauer@ 2020-10-21T10:55:40.502Z

Anyways

• robertbrauer@ 2020-10-21T10:55:49.759Z

The iOS problem....

• robertbrauer@ 2020-10-21T10:57:16.815Z

You show people the sign-in button for a Google app and they start wondering: do I have an account? If so, how many? What s the ldap? Maybe it's my Gmail account?

• robertbrauer@ 2020-10-21T10:58:16.214Z

As a result, they either never sign in or create a different account

• robertbrauer@g 2020-10-21T11:00:35.986Z

But I feel that the account value work shows that we leaped ahead. Since we signed in people automatically, they didn't realize that anymore. Probably not at top priority for the user at that moment

• robertbrauer@ 2020-10-21T11:01:10.345Z

And the effect: creepy cross product p13n

ohelyse@ 2020-10-21T11:01:12.959Z

mm hmmm

• robertbrauer@ 2020-10-21T11:01:26.676Z

BUT

• ohelyse@ 2020-10-21T11:01:29.939Z

how would the Oauth model solve for this one?

• ohelyse@ 2020-10-21T11:01:32.036Z

o image.png

• ohelyse@_____2020-10-21T11:01:34.113Z

oh sorry go on

• ohelyse@ 2020-10-21T11:01:40.774Z

• robertbrauer (2020-10-21T11:01:54.675Z

Just.

• robertbrauer(data 2020-10-21T11:03:26.005Z

I have that in a deck somewhere.

• **ohelyse**@ 2020-10-21T11:03:46.636Z got it

• robertbrauer@ 2020-10-21T11:06:04.311Z

But Oauth would only solve for 1p:-/

• robertbrauer@ 2020-10-21T11:06:48.555Z

Search for Nike, you'd still have Nike ads follow you across the internet

• robertbrauer(4 2020-10-21T11:07:09.665Z

In Chrome

• robertbrauer@ 2020-10-21T11:08:32.086Z

Unauthenticated users would be a whole other can of worms. But there will always be issues. Let's start brainstorming somewhere

• robertbrauer (2020-10-21T11:19:37.363Z

Do we have a list in the systemic issues that we're trying to tackle? In my head: p13n across 1P, 1P vs. 3P, profile based p13n

• robertbrauer@ 2020-10-21T11:20:14.699Z

Stuff like face recognition strikes me as a feature level issue that I don't feel very comfortable to have an opinion on

• ohelyse 2020-10-21Tl1:20:21.412Z

feelings of exploitation, suspicions we sell data (maybe more hoizontals, though?)

• adebooij@_____2020-10-21T11:20:45.895Z

well, what harm do those bring? can you influence somebody to buy things or believe things

• adebooij@_____2020-10-21T11:21:13.374Z

to open them up to financial harm or physical harm

adebooij@2020-10-21T11:21:15.876Z
or emotional harm

• ohelyse@_____2020-10-21T11:22:53.658Z

I know I'm a broken record, but IMO facial recognition is relevant because while we can say it's a product feature, it is, in the end, a Google-branded experience — and in the eyes of the world, _Google_ has your face data. https://www.youtube.com/watch?v=jZjmlJPJgug

- o https://www.youtube.com/watch?v=jZjmlJPJgug
- https://www.youtube.com/watch?v=jZjmlJPJgug
- adebooij@_____2020-10-21T11:24:03.471Z

"Bingo indeed Denzel"

• ohelyse@ 2020-10-21T11:24:26.043Z

"or the face of any toucan" @

• kallebu@ 2020-10-21T11:35:00.536Z

Robert Brauer I see face recognition within our products related to PN as people can't understand clearly what data, in what Google product is used for what and who has access to it and what they can do with it. So for us it is less about the feature, more about the overall approach to transparency and control, where we do have a strong POV when it comes to face recognition.

• kallebu@ 2020-10-21T11:35:11.612Z

So what Elyse said @

• robertbrauer(a 2020-10-21T12:46:53.642Z

I hear you. Not that I don't have a personal opinion about face recognition, but I don't quite see the systematic dilemma. "what data, in what Google product is used for what and who has access to it and what they can do with it" is a pretty broad spectrum

• robertbrauer@ 2020-10-21T12:47:33.648Z

but that's besides the argument. if we want to start jamming on something, it would be great to find some starting point

• robertbrauer@ 2020-10-21T12:47:42.860Z

and if we already have that, great

• kallebu@ 2020-10-21T12:51:02.970Z

Well, let's go back to the CL work then. So much goodness from that moonshot design sprint

• kallebu@ 2020-10-21T12:51:08.585Z

Also any trigger moment

• kallebu@ 2020-10-21T12:51:19.436Z

— not sue I am on the same page as you guys here

• robertbrauer (2020-10-21T12:55:33.106Z

from earlier discussion, these are

- Screenshot 2020-10-21 at 14.54.52.png
- robertbrauer 2020-10-21T12:55:42.230Z

apple id is also now part of this

• robertbrauer@ 2020-10-21T12:55:51.406Z

from go/firebear-ux

- http://goto.google.com/firebear-ux
- robertbrauer(data 2020-10-21T12:56:57.392Z

with some updates to iOS, we were able to recognise users. stuff like this.

Screenshot 2020-10-21 at 14.54.07.png

kallebu@ 2020-10-21T12:57:01.599Z

But Google+ is gone, I hardly see Twitter, Instagram is Facebook. Actually these days it is mostly Google, Facebook and Apple I would say

• robertbrauer@ 2020-10-21T12:57:51.357Z

yes. but that wasn't the question

• kallebu@ 2020-10-21T12:58:00.283Z

Right

• kallebu@ 2020-10-21T12:58:09.062Z

Sorry

• robertbrauer@ 2020-10-21T12:58:16.992Z

no problem 🙂

• robertbrauer (2020-10-21T12:58:51.601Z

and you're right, there are fewer now on popular apps, but that also depends on the region

• robertbrauer@ 2020-10-21T12:59:19.908Z

keep in mind that asian markets also have popular sso's that we don't see so often

• kallebu@ 2020-10-21T13:00:01.086Z

Very fair, very very different market

• robertbrauer(a 2020-10-22T06:20:40.512Z

To come back the argument of evenness and mental models that people might be able to construct easily. The

o IMG 2079.png

• robertbrauer (2020-10-22T06:23:17.635Z

this is a moment, in which you're about to add Nest stuff to *your Google ecoystem*. No need to worry prior which products belong to Google and which don't. No need to worry where data goes because that only happens if you plug these things together.

• robertbrauer (2020-10-22T06:29:33.343Z

and the would be addressed by showing users that there's already an SSO available to be used right away

o Screenshot 2020-10-22 at 08.28.24.png